

# EXHIBIT 2

HIGHLY CONFIDENTIAL Carrie Griffiths

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MICHIGAN  
3 SOUTHERN DIVISION  
4  
5 \_\_\_\_\_  
6 )  
7 ) Civil Action No.  
8 ) 5:16-cv-10444-JEL-MKM  
9 In re: FLINT WATER CASES ) (consolidated)  
10 )  
11 ) Hon. Judith E. Levy  
12 ) Mag. Mona K. Majzoub  
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9 HIGHLY CONFIDENTIAL  
10 Wednesday, November 16, 2022  
11

12 Remote videotaped deposition of  
13 CARRIE GRIFFITHS, held at the location of the witness  
14 in Boston, Massachusetts, commencing at 9:09 a.m., on  
15 the above date before Carol A. Kirk, Registered Merit  
16 Reporter, Certified Shorthand Reporter, and Notary  
17 Public.  
18  
19  
20  
21

22 GOLKOW LITIGATION SERVICES  
23 877.370.3377 ph | 917.591.5672 fax  
24 deps@golkow.com

1           Q.     The couple of times that you  
2     watched or listened to the trial via Zoom, did  
3     you do so at someone's instruction, or did you  
4     do so on your own accord?

5           A.     My own accord.

6           Q.     Who do you report to directly at  
7     Veolia North America?

8           A.     Our chief executive officer.

9           Q.     When you took the role that you  
10    currently have in 2018 at Veolia North America,  
11    who was it that you replaced in that position?

12          A.     I think -- it was a woman, and I  
13    cannot remember her name.

14          Q.     No problem.

15                 Are you aware of whether Veolia  
16    North America at any point in time between 2016  
17    and today participated in a Google keyword or  
18    AdWord campaign?

19          A.     Yes, I am.

20          Q.     And did Veolia participate in such  
21    a campaign?

22          A.     Yes, it did.

23          Q.     Is that campaign ongoing?

24          A.     Yes, it is.

1 conversation be with you and Jace or with you,  
2 Jace, and some others, and then Mr. Kramer  
3 wanted some specificity about which campaign I'm  
4 referring to.

5 So going back to my question about  
6 that conversation that you said Jace would have  
7 to have with you, would that be exclusively with  
8 you, or would it include others?

9 MR. KRAMER: Object to the  
10 preface, but you can answer the  
11 question.

12 A. These ads were set up before I  
13 came to the company, and they've been running  
14 along without any change on my part or Jace's  
15 part. Any changes to that campaign would be a  
16 conversation that I would have with  
17 headquarters.

18 Q. And if you were to have that  
19 conversation at headquarters -- I know that in  
20 your corporate world, these are just normal  
21 words that you use. Headquarters -- what do you  
22 mean by "I would have a conversation with  
23 headquarters" or at headquarters. Who are you  
24 referring to?

1 A. I don't know.

2 Q. Are you aware of the Tiger Joyce  
3 op-ed that appeared in the Detroit News about a  
4 week before the article we've been discussing  
5 appeared?

6 A. I am not.

7 Q. Okay. Do you know whether Rich  
8 has participated in the placement of op-eds  
9 across the United States or other places in the  
10 world that were written by somebody outside of a  
11 Veolia entity?

12 MR. KRAMER: Objection.

13 A. I don't know.

14 Q. Is it possible?

15 MR. KRAMER: Objection.

16 A. I don't know.

17 Q. Are you aware of whether Veolia  
18 has ever tried to find a friendly voice to pen  
19 an op-ed that either directly or indirectly  
20 supports Veolia's activities?

21 MR. KRAMER: Are you talking about  
22 any topic any time ever?

23 MR. STERN: Yeah.

24 A. I don't know. It's not unusual.

1 March of 2022?

2 A. Suez North America.

3 Q. And so as part of the merger with  
4 Suez, Rich became a Veolia North America  
5 employee as opposed to his previous employment  
6 with Suez; is that correct?

7 A. Correct.

8 Q. If I wanted to know if Veolia ever  
9 participated in the publication of an op-ed  
10 after March of 2022, would Rich be the person  
11 who I would ask that question to?

12 A. Yes.

13 Q. If I wanted to know if anyone from  
14 Veolia played any role whatsoever in the  
15 placement of a Tiger Joyce article in the  
16 Detroit News in either late August or early  
17 September 2022, would Rich be the person to ask  
18 that question to?

19 A. I don't know.

20 Q. Do you know who Tiger Joyce is?

21 A. I have no idea.

22 Q. Did you interact with any of the  
23 attorneys who were actually trying the first  
24 Flint bellwether case at any point in time

1 Q. Have you ever seen a document like  
2 it?

3 A. Yes.

4 Q. Okay. In what context have you  
5 seen a document like this document?

6 A. In preparation for this  
7 deposition, I looked at some data.

8 Q. Do you have any sense of what the  
9 data is that I'm looking at in this document  
10 based on your preparation for the deposition and  
11 other documents you looked at that are like it?

12 A. If this is related to the Google  
13 ad campaign as it relates to the Detroit News  
14 article, then this shows who was interested in  
15 the Flint lawsuit or with Veolia. These reflect  
16 the keywords that are typed into a search engine  
17 by people interested in those keywords. So any  
18 numbers for any states reflect how many people  
19 were interested in that geography related to  
20 those keywords.

21 Q. But you don't have an --

22 A. It's reasonable --

23 Q. I'm sorry. I interrupted you. I  
24 interrupted you. I'm sorry. If you could start

1     that part of your answer over. I didn't mean to  
2     talk over you.

3             A.     It's reasonable that Michigan  
4     would have a higher amount because of the  
5     interest of people in that state.

6             Q.     You understand that -- do you  
7     understand that dynamic ads have no bearing --  
8     strike that.

9                     Do you understand that keywords  
10    have absolutely nothing to do with dynamic ads?

11                    MR. KRAMER: Objection.

12             A.     I don't understand that.

13             Q.     Do you technically -- from an  
14    absolute technical standpoint, do you know the  
15    difference between keyword campaigns and dynamic  
16    ad campaigns?

17             A.     I don't.

18             Q.     You're the director of  
19    communications for Veolia North America. If, in  
20    fact, Veolia North America was engaging in both  
21    a keywords campaign and a dynamic ad campaign,  
22    who would be the person that works for you who  
23    could talk intelligently about the differences  
24    between those two campaigns and why Veolia



1 MR. KRAMER: Objection; misstates  
2 testimony.

3 A. I didn't create those  
4 advertisements.

5 Q. You mentioned that as to the Flint  
6 water crisis and any dynamic ads that Veolia may  
7 have engaged, you had no role whatsoever in  
8 those dynamic ads, right?

9 MR. KRAMER: Objection.

10 A. I didn't create those ads.

11 Q. Okay. You mentioned that you had  
12 no role whatsoever in the production of tweets  
13 from the VNA Flint Facts Twitter account, right?

14 MR. KRAMER: Object to form.

15 A. Correct.

16 Q. So how did you know that anything  
17 in the article related to Veolia advertisements  
18 was inaccurate?

19 A. I checked with my team for the  
20 data, made sure that we were not targeting  
21 jurors or targeting anything specifically other  
22 than the United States and Canada, and I was  
23 assured that we weren't.

24 Q. What data did you look at?

CERTIFICATION

I, Carol A. Kirk, Registered Merit Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination, CARRIE GRIFFITHS, was duly remotely sworn by me to testify to the truth, the whole truth, and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place, and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor an employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.

Carol A Kirk

Carol A. Kirk, RMR, CSR

Notary Public

Dated: November 22, 2022